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**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF CALIFORNIA**

LOUISE GALVAN,

Plaintiffs,

v.

STANISLAUS COUNTY,  
DEPUTY JUSTIN WALL, DEPUTY  
JOSHUA SANDOVAL, DEPUTY  
EARL GAARDE,  
DEPUTY DEREK CROWLEY

and DOES 1-25, inclusive,

Defendants.

**CASE NO.: 1:21-cv-01641-  
ADA-BAM**

STIPULATION AND ~~PROPOSED~~  
ORDER TO MODIFY  
SCHEDULING ORDER

WHEREAS the Court issued a Scheduling Order on February 11, 2022 (Dkt. #9), and

WHEREAS the Court set a fact discovery cutoff date of April 21, 2023 an expert  
disclosure date of May 14, 2023, and a trial date of March 24, 2024, and

1 WHEREAS the parties have diligently pursued discovery, are working cooperatively  
2 and are attempting to complete discovery pursuant to the Court's Scheduling Order, and

3 WHEREAS because of unanticipated scheduling conflicts, Plaintiff has noticed, but has  
4 been unable to take certain depositions, including the depositions of the individually named  
5 defendants in this case.

6 NOW THEREFORE the Parties have met and conferred and hereby jointly request and  
7 stipulate, pursuant to Local Rules 6-1(b), 6-2, and 7-12, to the following modification of the  
8 Scheduling Order as follows:  
9

10 1. Solely for and limited to completion of the depositions of Deputy Justin Wall,  
11 Deputy Earl Gaarde, Deputy Darwin Sommerton (conditionally) and Marcelino Nuno  
12 (conditionally) and for no other purpose, the fact discovery cutoff date shall be extended to  
13 June 15, 2023;

14 2. The deposition of Deputy Joshua Sandoval is off-calendar;

15 3. Expert Disclosure shall be July 7, 2023;

16 4. Supplemental Expert Disclosure shall be August 4, 2023;

17 5. Expert Discovery cutoff shall be September 15, 2023;

18 6. Dispositive Motion Filing Deadline shall be October 13, 2023; and

19 7. The Pretrial Conference and Jury Trial dates shall remain unchanged, on  
20 January 24, 2024 and March 26, 2024 respectively.  
21

22 **IT IS SO STIPULATED**  
23

24 Respectfully submitted,

25 GEONETTA & FRUCHT, LLP

26 Dated: April 21, 2023

27 By: /s/ Kenneth N. Frucht  
KENNETH N. FRUCHT  
28

Attorneys for Plaintiff

MORDAUNT, ROUNDY, REIHL, &  
JIMERSON

Dated: April 21, 2023

By: /s/ Curtis Jimerson  
CURTIS JIMERSON

Attorneys for Defendants

**ORDER**

Pursuant to stipulation, and good cause appearing, the Court's Scheduling Order is modified as follows:

1. Non-Expert Discovery: June 15, 2023, for the limited purpose of completing the depositions of Deputy Justin Wall, Deputy Earl Gaarde, Deputy Darwin Sommerton (conditionally) and Marcelino Nuno (conditionally);
2. Expert Disclosure: July 7, 2023;
3. Supplemental Expert Disclosure: August 4, 2023;
4. Expert Discovery Cutoff: September 15, 2023
5. Dispositive Motion Filing Deadline: October 2, 2023.

The Pretrial Conference and Jury Trial dates shall remain unchanged, on January 22, 2024 and March 26, 2024 respectively.

IT IS SO ORDERED.

Dated: April 21, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE